

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

OTIS ELEVATOR COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 08 C 1107
	)	
EMERSON ELECTRIC COMPANY d/b/a	)	
U.S. ELECTRICAL MOTORS, INC.	)	Hon. Ronald A. Guzman
	)	Magistrate Judge Sidney I. Schenkier
-and-	)	
	)	
CHAMPLAIN CABLE CORPORATION	)	
	)	
Defendants.	)	

**NOTICE OF MOTION**

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on Tuesday, May 27, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, we will appear before the Honorable Ronald A. Guzman, or any judge sitting in his stead, in Room 1219 of the Everett McKinley Dirksen Building, Chicago, Illinois, and then and there present **Defendant Champlain Cable Corporation's Agreed Motion for An Extension of Time In Which to Answer or Otherwise Plead**, a copy of which is hereby served upon you.

Dated: May 19, 2008

Respectfully submitted,

/s/ Patrick J. Heneghan

Patrick J. Heneghan, Esq. (heneghan@sw.com)

Joseph J. Siprut, Esq.

SCHOPF & WEISS LLP

One South Wacker Drive, 28<sup>th</sup> Floor

Chicago, IL 60606-4617

(312) 701-9300

Fax: (312) 701-9335

Matthew B. Byrne, Esq.

Ross A. Feldmann, Esq.

GRAVEL AND SHEA

76 St. Paul Street, 7th Floor

P.O. Box 369

Burlington, Vermont 05402-0369

(802) 658-0220

Fax: (802) 658-658-1456

Admission *Pro Hac Vice* to be sought

**CERTIFICATE OF SERVICE**

I, Patrick J. Heneghan, an attorney, certify that the foregoing **Notice of Motion** was filed electronically with the Clerk of the Court using the CM/ECF system on this 19th day of May, 2008, which will automatically send email notifications of such filing to the following:

Harry D. Cornetti, Jr.  
Thomas W. Baker  
Tucker Ellis & West LLP  
925 Euclid Avenue  
1150 Huntington Building  
Cleveland, OH 44115-1475  
216.592.5000

*Lead Counsel for Otis Elevator Company*

John W. Bell  
William G. Beatty  
Johnson & Bell, Ltd.  
33 West Monroe Street  
Suite 2700  
Chicago, IL 60603  
312.456.5202  
[bellj@jbltd.com](mailto:bellj@jbltd.com)

*Lead Counsel for Emerson Electric Company*

Steven P. Rouse  
Menges & Molzahn, LLC  
20 North Clark Street  
Suite 2300  
Chicago, IL 60602  
312.553.8632  
[spr@menges.com](mailto:spr@menges.com)

*Local Counsel for Otis Elevator Company*

/s/Patrick J. Heneghan